

**Reid Rubinstein & Bogatz**  
 I. SCOTT BOGATZ, ESQ.  
 Nevada Bar No. 3367  
 KERRY E. KLEIMAN, ESQ.  
 Nevada Bar No. 14071  
 300 South Fourth Street, Suite 830  
 Las Vegas, Nevada 89101  
 Telephone: (702) 776-7000  
 Facsimile: (702) 776-7900  
[sbogatz@rrblf.com](mailto:sbogatz@rrblf.com)  
[kkleiman@rrblf.com](mailto:kkleiman@rrblf.com)  
*Attorneys for Defendant American Express*

**UNITED STATES DISTRICT COURT  
 DISTRICT OF NEVADA**

MARTIN D. ANDREW,

Plaintiff,

vs.

TRANSUNION, LLC; and AMERICAN  
 EXPRESS COMPANY,

Defendants.

Case No.: 2:19-cv-00331-JAD-PAL

**STIPULATION AND [PROPOSED]  
 ORDER TO EXTEND TIME FOR  
 AMERICAN EXPRESS NATIONAL  
 BANK TO FILE RESPONSE TO  
 PLAINTIFF'S COMPLAINT [ECF NO. #1]  
 [SECOND REQUEST]**

IT IS HEREBY STIPULATED AND AGREED, by and between Plaintiff, MARTIN D. ANDREW, and Defendant, AMERICAN EXPRESS NATIONAL BANK (incorrectly designated in the Complaint as "American Express Company") (hereafter "AMEX"), by and through their undersigned counsel, that Defendant AMEX may have an additional 10 days within which to answer or otherwise respond to Plaintiff's complaint [ECF No. 1], which was served on Defendant on February 25, 2019.

Therefore, the parties agree that the last day for AMEX to answer or otherwise respond to Plaintiff's complaint is Monday, April 29, 2019.

This request is made in good faith and not for the purpose of undue delay. This document is being electronically filed through the Court's CM/ECF System. Accordingly, counsel for Defendants hereby attests that (1) the content of this document is acceptable to all persons required to sign the document; (2) Plaintiff's counsel has concurred with the filing of this document and

has authorized defense counsel to affix his electronic signature hereto; and (3) a record supporting this concurrence could be made available if so ordered by this Court.

Dated this 16th day of April, 2019.

Respectfully submitted,

REID RUBINSTEIN & BOGATZ

HAINES & KRIEGER, LLC


By: /s/ Kerry E. Kleiman, Esq.  
I. Scott Bogatz, Esq. (3367)  
Kerry E. Kleiman, Esq. (14071)  
300 South Fourth Street, Suite 830  
Las Vegas, Nevada 89101  
*Attorneys for Defendant*  
*American Express National Bank*

By: /s/ Shawn W. Miller, Esq.  
Shawn W. Miller, Esq. (7825)  
8985 S. Eastern Ave. Suite #350  
Las Vegas, NV 89123  
*Attorneys for Plaintiff*

**ORDER**

IT IS SO ORDERED.

DATED this 17th day of April, 2019.

  
UNITED STATES DISTRICT JUDGE  
UNITED STATES MAGISTRATE JUDGE